

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

FEB 26 2019

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA

§  
§  
§  
§  
§  
§  
§  
§  
§

CRIM. NO.:

v.

DEANTHONY DOUCET, (01)  
AVERY JAMES (02), and  
MORGAN KANU-BRADLEY (03),

Defendants.

**INDICTMENT**

THE UNITED STATES GRAND JURY CHARGES:

**COUNT ONE**

**(Assault on a Federal Officer)**

**Title 18 USC §§ 111(a)(1) and (b) and 2**

On or about February 17, 2019, in the Houston Division of the Southern District of Texas, the defendants,

**DEANTHONY DOUCET,  
AVERY JAMES, and  
MORGAN KANU-BRADLEY**

aiding and abetting one another, did intentionally use a deadly and dangerous weapon, namely, a firearm, to forcibly assault, resist, oppose, impede, intimidate and interfere with a person designated in Section 1114 of Title 18 of the United States Code, to wit, Special Agent Darnell Smith of the Bureau of Alcohol, Tobacco, Firearms and Explosives, and did intentionally cause bodily injury to Special Agent Darnell Smith, while Agent Smith was engaged in the performance of his official duties as a special agent and employed by the

Bureau of Alcohol, Tobacco, Firearms and Explosives.

In violation of Title 18, United States Code, Section 111(a)(1) and 111(b) and Section 2.

**COUNT TWO**  
**(Assault on a Federal Officer)**  
**Title 18 USC §§ 111(a)(1) and (b) and 2**

On or about February 17, 2019, in the Houston Division of the Southern District of Texas, the defendants,

**DEANTHONY DOUCET,  
AVERY JAMES, and  
MORGAN KANU-BRADLEY**

aiding and abetting one another, did intentionally use a deadly and dangerous weapon, namely, a firearm, to forcibly assault, resist, oppose, impede, intimidate and interfere with a person designated in Section 1114 of Title 18 of the United States Code, to wit, Special Agent Taji Muttalib of the Bureau of Alcohol, Tobacco, Firearms and Explosives, while Agent Muttalib was engaged in the performance of his official duties as a special agent and employed by the Bureau of Alcohol, Tobacco, Firearms and Explosives.

In violation of Title 18, United States Code, Section 111(a)(1) and 111(b) and Section 2.

**COUNT THREE**  
**(Robbery of a Person in Lawful Control and Custody of**  
**Money of the United States)**  
**Title 18 USC §§ 2114(a) and 2**

On or about February 17, 2019, in the Houston Division of the Southern District of

Texas, the defendants,

**DEANTHONY DOUCET,  
AVERY JAMES, and  
MORGAN KANU-BRADLEY**

aiding and abetting one another, did intentionally take, by means of force and violence, money of the United States, from Special Agent Taji Muttalib of the Bureau of Alcohol, Tobacco, Firearms and Explosives, who was acting in an undercover capacity, while Agent Muttalib had lawful charge, control, and custody of said money of the United States, that is, Government funds intended for use during a controlled purchase of narcotics, and did put Agent Muttalib's life in jeopardy through the use of a dangerous weapon, to wit, a firearm.

In violation of Title 18, United States Code, Section 2114(a) and Section 2.

**COUNT FOUR**  
**(Conspiracy to Interfere with Commerce by Robbery)**  
**Title 18 USC § 1951(a)**

**INTRODUCTION**

At all times material to this Indictment, drug trafficking is an inherently economic enterprise and industry that affects interstate commerce.

On or about February 17, 2019, in the Houston Division of the Southern District of Texas, the defendants,

**DEANTHONY DOUCET,  
AVERY JAMES, and  
MORGAN KANU-BRADLEY**

did knowingly combine, conspire, confederate and agree, with each other and with other persons known and unknown to the Grand Jury, to obstruct, delay, and affect interstate commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did unlawfully conspire to take and obtain United States currency in the custody and possession of Special Agent Taji Muttalib of the Bureau of Alcohol, Tobacco, Firearms and Explosives, whom defendants understood to be a drug trafficker, against Agent Muttalib's will, by means of actual and threatened force, violence, and fear of injury to his person.

In violation of Title 18, United States Code, Section 1951(a).

**COUNT FIVE**  
**(Interference with Commerce by Robbery)**  
**Title 18 USC §§ 1951(a) and 2**

On or about February 17, 2019, in the Houston Division of the Southern District of Texas, the defendants,

**DEANTHONY DOUCET,**  
**AVERY JAMES, and**  
**MORGAN KANU-BRADLEY**

aiding and abetting one another, did knowingly and unlawfully obstruct, delay, and affect interstate commerce, as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery, as that term is defined in Title 18, United States Code, Section 1951, in that the defendants did

unlawfully take and obtain United States currency in the custody and possession of Special Agent Taji Muttalib of the Bureau of Alcohol, Tobacco, Firearms and Explosives, whom defendants understood to be a drug trafficker, against Agent Muttalib's will, by means of actual and threatened force, violence, and fear of injury to his person.

In violation of Title 18, United States Code, Section 1951(a) and Section 2.

**COUNT SIX**  
**(Possession of a Firearm in Furtherance of a Crime of Violence)**  
**Title 18 U.S.C. § 924(c)(1)(A)(ii) and 2**

On or about February 17, 2019, in the Houston Division of the Southern District of Texas, the defendants,

**DEANTHONY DOUCET,  
AVERY JAMES, and  
MORGAN KANU-BRADLEY**

aiding and abetting one another, did knowingly brandish, carry and use a firearm, during and in relation to crimes of violence for which they may be prosecuted in a Court of the United States, to wit: the crimes charged in Counts One and Two (Assault on a Federal Officer) of this Indictment.

In violation of Title 18 United States Code, Section 924(c)(1)(A)(ii) and Section 2.

**Notice of Criminal Forfeiture**

Pursuant to Title 18 United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461, the United States hereby gives notice that all

firearms and ammunition involved in or used in the commission of the offense in violation of Title 18, United States Code, Section 924(c)(1)(A)(ii) charged in Count Six, are subject to forfeiture, including but not limited to, the following:

1. Glock, Model 26, 9mm pistol, serial number BRX257, manufactured outside the State of Texas.
2. Taurus, Model PT 24/7, .40 Smith and Wesson caliber, serial number SCS13088, manufactured outside the State of Texas.
3. Any and all ammunition.

A TRUE BILL: . . . /

ORIGINAL SIGNATURE ON FILE

~~FOR~~ PERSON OF THE GRAND JURY

RYAN K. PATRICK  
United States Attorney

By: 

Richard W. Bennett  
Assistant United States Attorney  
1000 Louisiana, Suite 2300  
Houston, Texas 77002  
(713) 567-9000 Phone  
(713) 718-3300 Fax